

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$17,000.00 IN
UNITED STATES CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Gregory J. Haanstad, Acting United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for said district, alleges as follows:

1. This is a civil action *in rem* brought to enforce the provisions of Title 21, United States Code, Section 881(a)(6), which provide for the forfeiture of currency that was used or intended to be used in exchange for controlled substances, that represents proceeds of trafficking in controlled substances, or that was used or intended to be used to facilitate a violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*

2. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

3. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest

warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

4. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district.

5. The defendant property is approximately \$17,000.00 in United States currency seized from a safe located at XXX Wintergreen Avenue, Apt. X, Omro, Wisconsin, on or about February 26, 2015. The defendant property is presently in the custody of the United States Marshal Service in Green Bay, Wisconsin.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in the affidavit of Peter R. Sawyer, which is attached hereto as Exhibit A and is fully incorporated herein by reference.

7. On or about April 27, 2015, Anissa Trefren filed a claim to the defendant property.

8. The defendant, approximately \$17,000.00 in United States currency, was used, or intended to be used, in exchange for controlled substances, or represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*, and is therefore subject to forfeiture to the United States of America pursuant to Title 21, United States Code, § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property, approximately \$17,000.00 in United States currency, be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America

be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 5th day of January, 2016.

Respectfully submitted,

GREGORY J. HAANSTAD
Acting United States Attorney

By:

s/SCOTT J. CAMPBELL
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